

The Honorable Marsha J. Pechman

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

RICHARD O. BUSE,

Plaintiff,

v.

FIRST AMERICAN TITLE INSURANCE
COMPANY; FORECLOSURELINK, INC.;
GREENPOINT MORTGAGE FUNDING,
INC., MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC.,
RESCOMM HOLDINGS NO. 2, LLC; UM
ACQUISITIONS, LLC; TOM BLOCK, and
Doe Defendants 1 through 20,

Defendants.

No. C-08-0510-MJP

**DEFENDANT GREENPOINT
MORTGAGE FUNDING'S INITIAL
DISCLOSURES**

Defendant Greenpoint Mortgage Funding, Inc. (Greenpoint), through its counsel, makes the following initial disclosures pursuant to FED. R.CIV. P. 26(a)(1). Greenpoint does not make this disclosure with full knowledge of the facts, circumstances, and legal theories involved in this case, but rather, makes its initial disclosure based on the information reasonably available to it as of the date of this filing. Greenpoint anticipates that further discovery, investigation, legal research, and analysis may supply additional facts and theories that may amend this disclosure. Accordingly, Greenpoint reserves the right to supplement this initial disclosure at any time in accordance with FED.

R.CIV.

ROUTH CRABTREE OLSEN, P.S.

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DEFENDANT GREENPOINT'S INITIAL
DISCLOSURES 1 OF 3

P. 26(e).

Greenpoint further notes that the information set forth in this disclosure may include hearsay and other forms of information that are unreliable, irrelevant, or not otherwise admissible in evidence. Greenpoint therefore reserves all objections relating to inadmissible evidence. Greenpoint further states that this disclosure and any supplementation to this disclosure are made subject to the following objections:

- **Privileged Materials:** Greenpoint specifically reserves and asserts its objections to production of documents and tangible things that are protected from disclosure by the following privileges: investigative and trial preparation materials under FED. R. Civ. P. 26(b)(3); work-product materials under FED. R. Civ. P. 26(b)(3) and (4); consulting expert materials FED. R. Civ. P. 26(b)(4)(B); attorney-client communications, and other applicable privileges.

- **Irrelevant Materials:** Greenpoint further objects to the disclosure of any information that is irrelevant or not reasonably calculated to lead to the discovery of admissible evidence, or which is not likely to bear upon any claim or defense.

I. WITNESSES (FRCP 26(a)(1)(A)(i))

The claims against Greenpoint appear to be based upon purely legal questions, thud, Greenpoint does not anticipate, at least at this time, that there are any individuals who may have discoverable information that may be used to support Greenpoint's case. But if a witness is required, Cindy Green, 2300 Brookstone Centre Parkway, Columbus, GA 31904.

II. DOCUMENTS (FRCP 26(a)(1)(A)(ii))

It appears that the claims against Greenpoint are based upon purely legal issues, and the documents that may be used to support Greenpoint's case are the loan documents (i.e. the Note and Deed of Trust).

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2 **III. DAMAGES (FRCP 26(a)(1)(a)(III))**

3 Greenpoint is not presently claiming any damages from Plaintiff.

4 **IV. INSURANCE AGREEMENTS (FRCP 26(a)(1)(A)(iv))**

5 Greenpoint is not aware of any applicable insurance agreements that may be
6 liable to satisfy all or part of any judgment entered in this matter.

7 **V. EXPERT WITNESSES**

8 Greenpoint has not at this time identified any experts that may be used at trial to
9 present evidence under FRE 702, 703, or 705.

10 DATED July 10, 2008

11 **ROUTH CRABTREE OLSEN, P.S.**

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13 By: /s/ Steven Linkon
14 Steven Linkon, WSB #34896
15 Attorneys for Defendant, Greenpoint
16 Mortgage Funding, Inc.
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